

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	)	
	)	Chapter 11
NEIMAN MARCUS GROUP LTD LLC, <i>et al.</i> ,	)	Case No. 20-32519 (DRJ)
	)	
Debtors. <sup>1</sup>	)	(Jointly Administered)
	)	

**KOBRE & KIM LLP’S MOTION TO WITHDRAW  
AS COUNSEL FOR MARBLE RIDGE CAPITAL LP**

**THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.**

**REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.**

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Neiman Marcus Group LTD LLC (9435); Bergdorf Goodman Inc. (5530); Bergdorf Graphics, Inc. (9271); BG Productions, Inc. (3650); Mariposa Borrower, Inc. (9015); Mariposa Intermediate Holdings LLC (5829); NEMA Beverage Corporation (3412); NEMA Beverage Holding Corporation (9264); NEMA Beverage Parent Corporation (9262); NM Bermuda, LLC (2943); NM Financial Services, Inc. (2446); NM Nevada Trust (3700); NMG California Salon LLC (9242); NMG Florida Salon LLC (9269); NMG Global Mobility, Inc. (0664); NMG Notes PropCo LLC (1102); NMG Salon Holdings LLC (5236); NMG Salons LLC (1570); NMG Term Loan PropCo LLC (0786); NMG Texas Salon LLC (0318); NMGP, LLC (1558); The Neiman Marcus Group LLC (9509); The NMG Subsidiary LLC (6074); and Worth Avenue Leasing Company (5996). The Debtors’ service address is: One Marcus Square, 1618 Main Street, Dallas, Texas 75201.

Kobre & Kim LLP (“Kobre & Kim”) files this motion to withdraw as counsel to Marble Ridge Capital LP (“MR Capital”) in the above-captioned bankruptcy case (the “Motion”) and respectfully states as follow:

### **JURISDCITION**

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334(b). This is a core proceeding pursuant to 28 U.S.C § 157(B). Venue is proper before this Court pursuant to 28 U.S.C §§ 1408 and 1409.

2. The statutory and other bases for the relief requested in this Motion is Rule 83.2 of the Local Rules for the Southern District of Texas (the “Local Rules”).

### **RELIEF REQUESTED**

3. Kobre & Kim respectfully requests permission to withdraw as counsel to MR Capital. Foley & Lardner LLP (“Foley”) has appeared as counsel of record to MR Capital, and MR Capital is now being represented by Foley. Kobre & Kim remains counsel of record to Marble Ridge Master Fund LP and MRC Luxembourg S.A.R.L.

4. MR Capital does not oppose this Motion.

5. The Motion is not sought for the purposes of delay and withdrawal will not cause delay in these cases or in any related adversary proceeding, and will not cause any delay or prejudice to any party.

6. Pursuant to Rule 83.2 of the Local Rules for the Southern District of Texas, Kobre & Kim respectfully requests to be withdrawn as counsel for MR Capital in this matter and that all applicable notice and service lists, including the Court’s CM/ECF electronic notification list be updated accordingly.

**CONCLUSION**

**WHEREFORE**, Kobre & Kim respectfully requests that the Court enter the proposed order attached hereto and grant such other and further relief as may be just.

Dated: September 4, 2020

Respectfully submitted,

/s/ Daniel J. Saval

Michael S. Kim (admitted *pro hac vice*)  
Zachary D. Rosenbaum (admitted *pro hac vice*)  
Daniel J. Saval (admitted *pro hac vice*)  
Leif T. Simonson (admitted *pro hac vice*)  
Alexandra Fellowes (admitted *pro hac vice*)

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**CERTIFICATE OF SERVICE**

The undersigned certifies that on the 4th day of September, 2020, she caused a true and correct copy of the foregoing Kobre & Kim LLP's Motion to Withdraw as Counsel for Marble Ridge Capital LP to be served electronically on those parties requesting electronic service through the Court's ECF system.

/s/ Laura M. Fontaine

Laura M. Fontaine